

HEATHER E. WILLIAMS, #122664
Federal Defender
MEGAN T. HOPKINS, #294141
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95814
Tel: 916-498-5700/Fax: 916-498-5710

Attorney for Defendant
BRYAN PAUL TAMBLYN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:20-cr-00014-KJM
)	
Plaintiff,)	AMENDED STIPULATION FOR TEMPORARY
)	MODIFICATION OF CONDITIONS OF PRETRIAL
vs.)	RELEASE; [PROPOSED] ORDER
)	
BRYAN PAUL TAMBLYN,)	Hon. Edmund F. Brennan
)	
Defendant.)	
)	
)	

The defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Christina McCall, hereby stipulate to and request an order from this Court temporarily modifying the conditions of Mr. Tamblyn's pretrial release to permit him to attend a family memorial event honoring his late grandmother, and releasing her ashes at Dillon Beach, CA, which is outside of the electronic monitoring zone.

Mr. Tamblyn is currently on pretrial release in this district on a \$50,000 unsecured appearance bond, as well as an appearance bond secured by deeds of trust and co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. *See* Dkt. 26 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust). Additionally, Mr. Tamblyn has three (3) appointed third party custodians: Richard Espinosa, Sr., Jerome Espinosa, and Sheri Placencia.

Mr. Tamblyn is in compliance with his conditions of release. One of those conditions of

1 release is location monitoring. Mr. Tamblyn is subject to home detention, and therefore must
2 remain inside his residence at all times except for employment; education; religious services;
3 medical, substance abuse, or mental health treatment; attorney visits; court appearances; court
4 ordered obligations; or other activities pre-approved by the pretrial services officer¹.

5 Mr. Tamblyn requests, and the parties agree and so stipulate, that his Conditions of
6 Release be temporarily amended to specifically permit him to attend a family memorial event
7 honoring his late grandmother, and releasing her ashes at Dillon Beach, CA. The family
8 anticipates driving to Dillon Beach, CA in the mid-morning on Saturday, June 6, 2020, and
9 returning in the late afternoon or early evening. The family plans to gather at Dillon Beach to
10 release Mr. Tamblyn's grandmother's ashes, per her wishes, and share memories and prayers in
11 memorial. It is undetermined how long the event will last, but is not expected to exceed a few
12 hours. After the memorial, the family hopes to share a meal at a local restaurant, if they are able
13 to find seating availability given the current restrictions for dining establishments. After dinner,
14 the family plans to return to their homes in Sacramento, CA.

15 The travel time for a return trip to/from Dillon Beach, CA is approximately five (5)
16 hours. Allowing some additional time for traffic and the time set aside for the memorial and
17 family meal, the parties request a temporary modification of pretrial conditions to permit Mr.
18 Tamblyn's release from the monitor between 9:00 a.m. and 7:00 p.m. on Saturday, June 6, 2020.
19 Mr. Tamblyn will travel to and from the memorial event in the company of a third party
20 custodian, and will be in the presence of a third party custodian throughout the event and at the
21 family dinner to follow. Mr. Tamblyn will not deviate from the above-listed itinerary and if he
22 returns prior to 7:00 p.m. will immediately return to his residence in the company of a third party
23 custodian.

24 ///

25
26
27 ¹ Pretrial services interprets this condition to only permit their approval of other activities which are deemed
28 "essential," with all other activities requiring the approval of the Court. The pretrial services officer who supervises
Mr. Tamblyn advised defense counsel that this specific request would require the approval of the Court, because it is
not considered an "essential" activity.

[PROPOSED] ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Special Conditions of Release for defendant, Bryan Paul Tamblyn, be Temporarily Amended such that he is permitted to attend a family memorial event in Dillon Beach, CA between the hours of 9:00 a.m. and 7:00 p.m. on Saturday, June 6, 2020. Mr. Tamblyn shall travel to and from the event in the presence of a third-party custodian and shall be in the presence of a third party custodian for the entire time he is outside of the location monitoring zone. Mr. Tamblyn shall not deviate from the following itinerary: 1) travel to and from Dillon Beach, CA; 2) attendance at the family memorial for Mr. Tamblyn's grandmother; 3) attendance at a family meal following the memorial. If Mr. Tamblyn returns from the event prior to 7:00 p.m. he shall immediately return to the approved residence. Mr. Tamblyn shall not be in the presence of any juveniles or minors unless that juvenile or minor's parent or guardian is also present. All other conditions of pretrial release shall remain in force.

The Temporary Amended Special Condition of Release is hereby adopted.

DATED: June 5, 2020



HON. EDMUND F. BRENNAN
United States Magistrate Judge